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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

1. Jason Todd Mogler
(Counts 1-84),
2. James Jeffrey Hinkeldey
(Counts 1-84),
3. Casimer Anthony Polanchek II
(Counts 1-84),
4. James Lex Stevens
(Counts 1-84), and
5. Sylvia Torres, aka Sylvia Torres
Macker, Sylvia Guadalupe Torres
Carillo,
(Counts 1-84),

Defendants.

CR-15-1118-PHX-SPL (JZB)

INDICTMENT

VIO: 18 U.S.C. § 371
Conspiracy
(Count1)

18 U.S.C. § 1341
Mail Fraud
(Counts 2-18)

18 U.S.C. § 1343
Wire Fraud
(Counts 19-57)

18 U.S.C. § 1028A
Aggravated Identity Theft
(Counts 58-64)

18 U.S.C. § 1957
Transactional Money Laundering
(Counts 65-84)

18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(1)
28 U.S.C. § 2461(c)
Forfeiture allegations

THE GRAND JURY CHARGES:

At all times material to this indictment, within the District of Arizona and elsewhere:

INTRODUCTION

1. Between about January of 2006 and June of 2014, JASON MOGLER, JAMES HINKELDEY, CASIMER POLANCHEK, JAMES STEVENS and SYLVIA

1 TORRES defrauded approximately 226 investor-victims out of more than \$18 million by
2 promoting and selling fraudulent high-yield investments, primarily involving: (1) real
3 estate development projects in Sonora, Mexico; (2) waste management and recycling
4 companies in Nevada and Illinois; and (3) distressed residential real estate in Arizona. In
5 relation to these purported investment opportunities, MOGLER, HINKELDEY,
6 POLANCHEK, STEVENS, and/or TORRES participated in making materially false
7 statements and omissions to obtain investment funds, orally during in-person or radio
8 solicitations, and in writing in private placement memorandums, marketing materials,
9 contracts, and other documents. MOGLER, HINKELDEY, POLANCHEK, STEVENS,
10 and/or TORRES then used the investment funds for purposes other than what was
11 promised to investor-victims, such as for personal living expenses or other business
12 ventures, and in some instances used funds received from later investor-victims to make
13 payments to earlier investor-victims.

14 **Individuals and Entities Involved**

15 2. **JASON MOGLER** resided in Arizona and orchestrated all three types of
16 fraudulent investment opportunities, acting through numerous entities, either alone or
17 with others.

18 a. In relation to the fraudulent investments in real estate development
19 projects in Mexico, MOGLER and others acted primarily through the following eight
20 entities:

- 21 • Tri-Core Business Development, LLC (TCBD), incorporated in
22 Arizona on January 27, 2006, with a business address of 8840 E. Chaparral Road,
23 #150, in Scottsdale; and for which MOGLER was a member/manager;
- 24 • Tri-Core Companies, LLC (TCC), incorporated in Arizona on August
25 27, 2007, with a business address of 8840 E. Chaparral Road, #150, in Scottsdale;
26 and for which MOGLER and HINKELDEY were members/managers;
- 27 • Tri-Core Mexican Land Development, LLC (TCMLD), incorporated in
28

1 Arizona on May 9, 2007, with a business address of 8840 E. Chaparral Road,
2 #150, in Scottsdale; and for which MOGLER, STEVENS and TORRES were
3 members/managers;

4 • TCC 1, LLC, incorporated in Arizona on January 22, 2008, with a
5 business address of 8840 E. Chaparral Road, #270, in Scottsdale; and for which
6 MOGLER, HINKELDEY, and TCC were managers/members;

7 • TCC 2, LLC, incorporated in Arizona on January 22, 2008, with a
8 business address of 8840 E. Chaparral Road, #270, in Scottsdale; and for which
9 MOGLER and HINKELDEY were managers/members;

10 • Arizona Investment Center (AIC), registered as a trademark name on
11 December 1, 2009, by Pangaea Investment Group, LLC, an entity owned by
12 POLANCHEK; AIC advertised as partners with the Tri-Core entities and other
13 entities owned by MOGLER and HINKELDEY;

14 • Phoenix Premium Developers, Sociedad De Responsabilidad Limitada
15 De Capital Variable, established in Mexico in December of 2011, with a business
16 address in Mexico; for which TTC 1 and TCC 2, owned by MOGLER and
17 HINKELDEY, were managers/members; and

18 • Alternative Investments International, LLC (AII), incorporated in
19 Wisconsin on November 14, 2010, by Vicki N., a Wisconsin salesperson solicited
20 by MOGLER and POLANCHEK to sell the Tri-Core entities' investments in
21 Wisconsin, Illinois, and Minnesota.

22 b. In relation to the fraudulent investments in waste management and
23 recycling companies, MOGLER and others acted primarily through the following five
24 entities:

25 • ERC Investments, LLC (ERCI), incorporated in Arizona on April 21,
26 2011, with a business address of 8840 E. Chaparral Road, #270, in Scottsdale; and
27 for which MOGLER was the sole manager/member;
28

1 • ERC of Nevada, LLC (ERCN), incorporated in Arizona on February 23,
2 2012, with a business address in Nevada; and for which MOGLER was the sole
3 manager/member;

4 • ERC Compactors, LLC (ERCC), incorporated in Arizona on August 19,
5 2011, with a business address of 8840 E. Chaparral Road, #270, in Scottsdale; and
6 for which MOGLER and HINKELDEY were the managers/members;

7 • ERC of Chicago, LLC, incorporated in Arizona on December 19, 2011,
8 with a business address of 8840 E. Chaparral Road, #270, in Scottsdale; and for
9 which TCBD, ERCI, and an entity owned by POLANCHEK were the
10 managers/members; and

11 • C&D Construction Services, Inc. (C&D), incorporated in Nevada on
12 April 26, 2000, with a business address in Nevada; and for which Nevada
13 residents were the members/managers.

14 c. In relation to the fraudulent Phoenix distressed real estate
15 investments, MOGLER and others acted primarily through the following two entities:

16 • Phoenix Premium Developers, LLC (PPD), incorporated in Arizona on
17 July 21, 2009, with a business address of 8840 E. Chaparral Road, #150, in
18 Scottsdale; and for which MOGLER and HINKELDEY were members/managers;
19 and

20 • Phoenix Premium Properties, LLC (PPP), incorporated in Arizona on
21 August 7, 2009, with a business address of 8840 E. Chaparral Road, #150, in
22 Scottsdale; and for which MOGLER and HINKELDEY were members/managers.

23 3. **JAMES HINKELDEY** resided in Arizona, and he acted in conjunction
24 with MOGLER and others in relation to all three fraudulent investment opportunities. He
25 acted primarily through the entities described above.

26 4. **CASIMER POLANCHEK** resided in Arizona and acted in conjunction
27 with MOGLER, HINKELDEY and others in relation to all three fraudulent investment
28

1 opportunities. In addition to involvement with several of the entities above, he was
2 affiliated with the following entities:

3 • Pangaea Investment Group, LLC (Pangaea), incorporated in Arizona on
4 August 10, 2009, with a business address of 826 E. Gila Lane, Chandler; for which
5 POLANCHEK was a member, doing business as AIC;

6 • Remisac, LLC, an anagram of "Casimer," was incorporated in Nevada
7 on September 13, 2011, with a business address in Vegas, NV; for which
8 POLANCHEK was the sole manager/member; and

9 • Polanchek, LLC, incorporated in Arizona on September 9, 2008, with a
10 business address of 826 Gila Lane, Chandler; and for which POLANCHEK was a
11 manager/member.

12 5. **JAMES STEVENS** resided in California and Mexico and was a licensed
13 appraiser; he acted primarily in relation to the fraudulent real estate development
14 investment opportunity involving land development in Mexico. In addition to affiliation
15 with several of the entities above, he was affiliated with the following entities:

16 • Wert-Berater Commercial, LLC (WBC), incorporated in Nevada on
17 April 14, 2006, with a Nevada business address, principally by Donald S.; the
18 corporation expired in 2007, and was then reinstated on July 16, 2012 by Oscar
19 Hernandez, a relative of TORRES; and

20 • Mar De Cortez Construction Company (Mar de Cortez CC), created as a
21 dba of WBC in Nevada by STEVENS on July 16, 2012, and used by STEVENS
22 and others to sell investments in the Mexican land project Mar de Cortez to
23 investors.

24 6. **SYLVIA TORRES** resided in California and Mexico, was a citizen of both
25 Mexico and the United States, and was STEVENS' girlfriend; she also acted primarily in
26 relation to the fraudulent real estate development investment opportunity involving
27 Mexican land.

Mexican Land Fraud

7. Investor-victims were solicited to invest in various real estate development ventures involving four lots of land – lots 3, 5, 46, and 47 – located in the town of El Golfo de Santa Clara, Sonora, Mexico. Investors were falsely told their funds would be used for the purchase and/or development of water-front property located in Sonora, Mexico, and that the funds were secured by the property.

a. As a result of 11 fraudulent investment offerings, primarily by the Tri-core entities, between May 1, 2007, and July 14, 2012, victim-investors provided approximately \$8.2 million in investment funds.

b. Investors in Arizona and other states were solicited by MOGLER, HINKELDEY, POLANCHEK, and STEVENS in person at seminars and meetings, by mail in marketing materials and advertisements in magazines, and electronically through radio broadcasts and internet podcasts. Defendants also enlisted brokers in Wisconsin to sell the fraudulent investments in Wisconsin, Illinois, and Minnesota.

c. Defendant STEVENS provided false appraisals on the lots of land. The appraised values were grossly inflated, sometimes by more than 1,000%, and the appraisal reports contained material misstatements and omissions about STEVENS' interest in the appraised property and the involvement of third parties in the appraisal process.

d. Defendants STEVENS and TORRES made false claims of ownership related to all four lots of Mexican land.

e. The private placement memorandums (PPMs), authored primarily by MOGLER, HINKELDEY and/or STEVENS, misrepresented virtually every material aspect of the purported investment opportunities, including: the backgrounds and experience of the principals, the ownership status and value of the subject properties, and the secured nature of the investments.

f. No development was ever commenced on any lot, and the

1 investment funds were used for personal expenses, were diverted to other fraudulent or
2 failed business ventures, and were at times used to make interest or principal payments to
3 certain investor-victims.

4 **Waste Management and Recycling Fraud**

5 8. Investor-victims were solicited to invest in developing waste recycling
6 centers in Las Vegas and Chicago or in purchasing waste recycling compactors, and were
7 told that their investment funds were secured by the commercial land and recycling
8 equipment.

9 a. As a result of seven fraudulent investment offerings, primarily by the
10 ERC entities, between October 1, 2010, and February 21, 2012, investor-victims provided
11 approximately \$7 million in investment funds.

12 b. Investors were again solicited by MOGLER, HINKELDEY and
13 POLANCHEK in person at seminars and meetings, by mailing marketing materials to
14 potential investors and advertising in magazines, and through radio broadcasts and
15 internet podcasts. Defendants also enlisted brokers in Wisconsin to sell the fraudulent
16 investments in Wisconsin, Illinois, and Minnesota.

17 c. The PPMs, authored primarily by MOGLER and HINKELDEY,
18 contained materially false representations and omissions concerning, among other things:
19 the background and experience of the principals, how investor funds would be used, and
20 the secured nature of the investment.

21 d. The funds were ultimately not used for the purposes promised to
22 investors and instead were used for personal expenses and, at times, to pay the earlier
23 investors.

24 **Arizona Distressed Real Estate Fraud**

25 9. Investor-victims were solicited to invest in purchasing distressed residential
26 real estate in Phoenix and re-selling it at a profit, and they were told their investment
27 funds were secured by the purchased properties.

a. As a result of two fraudulent investment offerings by PPP between November 15, 2010, and January 10, 2012, investor-victims provided approximately \$1.1 million in investment funds.

b. Investors were solicited by MOGLER, HICKELDEY, and POLANCHEK, again by in person presentations at seminars and meetings, by mailing marketing materials to potential investors and advertising in magazines, and through radio broadcasts and internet podcasts.

c. The PPMs, authored primarily by MOGLER and HINKELDEY, misrepresented virtually every material fact concerning the purported investment opportunity, including: the background and experience of the principals, the operations and track record of the operation, how investment funds would be used, and the secured nature of the investment.

d. The funds ultimately were not used for the purposes promised to investors and instead were used for personal expenses and, at times, to make payments to the earlier investors.

Private Placement Memorandums

10. During the course of the conspiracy and scheme to defraud, the following 18 PPMs were issued, seeking to raise more than \$75,000,000 and promising returns of 12% to 80%, generally within 2 years:

Project / PPM	Offering Date	Offering Amount Sought
LOT 5	5/1/2007	\$3,500,000.00
LOT 5	2/1/2008	\$3,500,000.00
LOT 47	3/1/2008	\$4,500,000.00
TCC 2	9/1/2009	\$3,225,000.00
Mexican Land	6/1/2010	\$10,000,000.00
LAF5	6/1/2010	\$5,000,000.00
Mexican Land	6/3/2010	\$600,000.00
C & D Construction	10/1/2010	\$1,500,000.00
PPP POOL #4	11/15/2010	\$1,000,000.00
C & D Construction	2/1/2011	\$600,000.00
ERC of Nevada	3/1/2011	\$15,000,000.00

ERC of Nevada	5/1/2011	\$3,000,000.00
ERC Compactors	8/8/2011	\$1,500,000.00
PPP POOL #5	1/10/2012	\$1,000,000.00
ERC of Chicago	2/21/2012	\$5,000,000.00
ERC of Chicago	2/21/2012	\$5,000,000.00
Mar de Cortez	7/14/2012	\$5,000,000.00
Mar de Cortez	7/14/2012	\$10,000,000.00
Total Amount Sought		\$75,117,000.00

Investor-Victims

11. The 226 investor-victims set forth below made the following 442 investments in projects, primarily related to the investment in land development in Mexico (designated below as Lot A, Lot 5, Lot 47, LAF 5/Lot 3, Lot 110, TCC2, Mexican Land, and Mar De Cortez), waste management and recycling (designated below as ERCN, ERC of Chicago, ERCC, and C & D), and Arizona distressed real estate (designated below as PPP and HARP), totaling more than \$18 million, and listed by date of investment:

Name	Project	Amount Invested	Deposit Date (on or about)
Philip V.	Lot A	\$15,300.00	11/30/2006
Thomas J. & Holly M.	Lot A	\$5,000.00	12/19/2006
Marc & Ruth T.	Lot A	\$5,000.00	12/21/2006
Donna S.	Lot 5	\$75,000.00	4/24/2007
William C. (Entrust Mid South)	Lot 5	\$60,000.00	6/15/2007
Stephanie H.	Lot 5	\$10,000.00	7/5/2007
Kelley C.	Lot 5	\$5,000.00	7/11/2007
Victoria J M.	Lot 5	\$70,000.00	8/3/2007
Victoria J M.	Lot 5	\$30,000.00	8/3/2007
Raymond B. (Mid-Atlantic)	Lot 5	\$100,000.00	8/8/2007
Brent Lane & Sherry Jean P.	Lot 5	\$10,000.00	8/8/2007
Henry S.	Lot 5	\$5,000.00	9/21/2007
Pat R. Living Trust	Lot 5	\$10,000.00	9/28/2007
Brian & Cheryl B.	Lot 5	\$5,000.00	10/1/2007
American Pension Services Inc (Unidentified Investor)	Mexican Land	\$10,000.00	10/4/2007

1	Michael W & Elizabeth M S.	Lot 5	\$30,000.00	10/16/2007
2	Manuel R.	Lot 5	\$50,000.00	10/17/2007
3	Joseph & Veronica P.	Lot 5	\$5,000.00	10/24/2007
4	John & Jennifer G.	Lot 5	\$15,000.00	11/1/2007
5	John & Lynn P.	Lot 5	\$20,000.00	11/14/2007
6	Joseph M.	Lot 5	\$5,000.00	11/16/2007
7	Greg A.	Lot 5	\$5,000.00	11/20/2007
8	Jeanette C J.	Lot 5	\$20,000.00	11/21/2007
9	Delmar D & Margaret-Ann F.	Lot 5	\$10,000.00	11/26/2007
10	Kristin L F. (D)	Lot 5	\$10,000.00	11/26/2007
11	Rodney & Carrie F.	Lot 5	\$200,000.00	11/28/2007
12	Rodney & Carrie F.	Lot 5	\$100,000.00	11/28/2007
13	Randall U.	Lot 5	\$25,000.00	12/6/2007
14	Gregory D & Jennifer K & Alexander J A.	Lot 5	\$10,000.00	12/7/2007
15	Benjamin & Krystylle R.	Lot 5	\$10,000.00	12/7/2007
16	Richard A & Carol A.	Lot 5	\$100,000.00	12/14/2007
17	Jannene K B. (Savant Properties LLC)	Lot 5	\$5,000.00	12/14/2007
18	Michael A.	Lot 5	\$10,000.00	12/17/2007
19	Mark & Jim V.	Lot 5	\$5,000.00	12/27/2007
20	Georgian A.	Lot 5	\$5,000.00	1/4/2008
21	Gregory D & Jennifer K & Alexander J A.	Lot 5	\$5,000.00	1/4/2008
22	Georgian A.	Lot 5	\$5,000.00	1/11/2008
23	Belinda R.	Lot 5	\$20,000.00	1/18/2008
24	Belinda R.	Lot 5	\$5,000.00	1/18/2008
25	Richard L & Joyce Lewis W.	Lot 5	\$50,000.00	1/18/2008
26	Henrik J.	Lot 5	\$25,000.00	1/28/2008
27	Maria M.	Lot 5	\$10,000.00	1/28/2008
28	Tiffany G.	Lot 5	\$5,000.00	1/30/2008
	John D & Jodi C H.	Lot 5	\$10,000.00	1/30/2008
	Darlene M V.	Lot 5	\$5,000.00	1/30/2008
	Rumann J.	Lot 5	\$10,000.00	2/13/2008
	Mark A E.	Lot 5	\$20,000.00	2/15/2008
	Dr Jerold J M.	Lot 5	\$10,000.00	2/15/2008
	Eric M.	Lot 5	\$10,000.00	2/15/2008
	Craig A T.	Lot 5	\$10,000.00	2/15/2008
	Eric M.	Lot 5	\$5,000.00	2/22/2008

1	William C. (Entrust Mid South)	Mexican Land	\$50,000.00	2/26/2008
2	Leo & Lorraine S.	Lot 5	\$5,000.00	2/26/2008
3	William C. (Entrust Mid South)	Mexican Land	\$10,000.00	2/27/2008
4	Kathleen Ann R.	Lot 5	\$15,000.00	3/4/2008
5	David & Alicia W.	Lot 5	\$90,000.00	3/4/2008
6	David H.	Lot 5	\$5,000.00	3/13/2008
7	Andrew Eric & Becky G B.	Lot 5	\$10,000.00	3/14/2008
8	Martha H.	Lot 5	\$15,000.00	3/14/2008
9	Erik T.	Lot 5	\$124,975.00	3/14/2008
10	Gregory D & Jennifer K & Alexander J A.	Lot 5	\$5,000.00	3/20/2008
11	Warren W & Sue R S.	Lot 5	\$10,000.00	3/20/2008
12	Kurt S.	Lot 5	\$5,000.00	3/28/2008
13	Harry W.	Lot 5	\$200,000.00	4/7/2008
14	Equity Trust Company (Unidentified Investor)	Mexican Land	\$7,700.00	4/25/2008
15	Equity Trust Company (Unidentified Investor)	Mexican Land	\$2,300.00	4/25/2008
16	Arlene F.	Lot 5	\$5,000.00	4/25/2008
17	Margaret A L.	Lot 5	\$10,000.00	4/25/2008
18	William C. (Entrust Mid South)	Mexican Land	\$5,000.00	5/1/2008
19	Michael D. (Amber Gold Inc)	Lot 5	\$30,000.00	5/2/2008
20	Michelle Lauren M.	Lot 47	\$28,500.00	5/8/2008
21	Dr Jerold J M.	Lot 47	\$40,000.00	5/16/2008
22	Richard L & Joyce Lewis W.	Lot 47	\$200,000.00	6/25/2008
23	Francis L.	Lot 47	\$10,000.00	6/27/2008
24	American Pension Services Inc (Unidentified Investor)	Mexican Land	\$10,000.00	6/30/2008
25	Equity Trust Company (Unidentified Investor)	Mexican Land	\$10,000.00	7/3/2008
26	Equity Trust Company (Unidentified Investor)	Mexican Land	\$10,000.00	7/3/2008
27	Equity Trust Company (Unidentified Investor)	Mexican Land	\$5,000.00	7/3/2008
28	Christina C.	Lot 47	\$10,000.00	7/23/2008
	Rich C. (Usery Pass, LLC)	Lot 47	\$20,000.00	7/25/2008
	Casimer Anthony P.	Lot 47	\$100,000.00	8/1/2008

1	Jerome G.	Lot 47	\$50,000.00	8/8/2008
2	Casimer Anthony P.	Lot 47	\$100,000.00	8/29/2008
3	Jerome G.	Lot 47	\$30,000.00	10/9/2008
4	Casimer Anthony P.	Lot 47	\$40,000.00	10/29/2008
5	Paul S. (Barmis Premier Capital LLC)	Lot 47	\$100,000.00	11/4/2008
6	James C C.	Lot 47	\$100,000.00	11/18/2008
7	Thomas J & Holly M M.	Lot 47	\$10,000.00	11/18/2008
8	Cynthia M.	Lot 47	\$10,000.00	11/18/2008
9	Michael C.	Lot 47	\$40,000.00	12/5/2008
10	Ralph W.	Lot 47	\$12,000.00	12/12/2008
11	James S & Nancy K C.	Lot 47	\$10,000.00	12/22/2008
12	Paula A G.	Lot 47	\$10,000.00	12/29/2008
13	Leslie B. (T)	Lot 47	\$10,000.00	1/21/2009
14	Alfred R T.	Lot 47	\$10,000.00	2/10/2009
15	James C C.	Lot 47	\$50,000.00	2/17/2009
16	Paul L.	Lot 47	\$50,000.00	2/17/2009
17	Mark S. (Floatron, Inc)	Other: ATM	\$50,000.00	4/13/2009
18	Mark S. (Fuel Fresh, Inc)	Other: ATM	\$200,000.00	4/17/2009
19	Mark S. (Floatron, Inc)	Other: ATM	\$250,000.00	5/6/2009
20	Mark S.	HARP	\$100,000.00	5/6/2009
21	Mark S.	HARP	\$100,000.00	5/6/2009
22	Mark S.	HARP	\$100,000.00	5/6/2009
23	Thuy Viet V. (N)	Lot 47	\$10,000.00	5/29/2009
24	Mark S. (Fuel Fresh, Inc)	HARP	\$100,000.00	6/11/2009
25	Dr Matthias P.	Lot 47	\$150,000.00	6/30/2009
26	Elton C.	Lot 47	\$69,985.00	7/7/2009
27	Matthew C.	Lot 47	\$70,000.00	7/8/2009
28	Shelby S.	Lot 47	\$15,000.00	8/7/2009
	Mark S. (Floatron, Inc)	TCC2	\$500,000.00	9/10/2009
	Mark S. (Fuel Fresh, Inc)	HARP	\$100,000.00	9/10/2009
	Mark S.	HARP	\$100,000.00	9/10/2009
	Mark S.	HARP	\$20,000.00	9/10/2009
	Matthias P.	Lot 110	\$150,000.00	9/28/2009
	Mark S. (Floatron, Inc)	TCC2	\$100,000.00	10/9/2009
	Mark S. (Fuel Fresh, Inc)	Other: ATM	\$100,000.00	10/9/2009
	Ruth Ann N.	TCC2	\$102,500.00	10/20/2009
	Marjorie K.	HARP	\$70,000.00	11/13/2009
	Leslie B. (T)	Lot 47	\$65,610.03	11/17/2009
	Joseph R.	Other: Tri-Core Entertainment	\$20,000.00	11/17/2009

1	Maury & Teresa S.	Lot 47	\$12,650.00	11/17/2009
2	Mark S.	HARP	\$100,000.00	11/18/2009
3	Marjorie N K. & Mark S.	Mexican Land	\$200,000.00	12/9/2009
4	Maury & Teresa S.	Lot 47	\$10,000.00	12/14/2009
5	Levern & Jocelyn L.	Lot 47	\$10,000.00	12/23/2009
6	Leslie B. (T)	Lot 47	\$23,572.04	1/19/2010
7	Sandra S.	Other: Tri-Core Entertainment	\$10,000.00	1/26/2010
8	Naomi Lynn P. (Nkitten LLC)	Lot 47	\$10,000.00	2/9/2010
9	Ryan A.	Lot 47	\$10,000.00	3/1/2010
10	Marjorie N K. & Mark S.	Mexican Land	\$200,000.00	3/25/2010
11	Richard J & Shawna V D.	Lot 47	\$150,000.00	4/15/2010
12	Sally N.	TCC2	\$10,000.00	4/15/2010
13	Michael W.	Unknown	\$25,000.00	5/12/2010
14	Kimberly G E. (B)	Lot 47	\$15,000.00	5/24/2010
15	Claudia M.	LAF5 / Lot 3	\$5,000.00	6/7/2010
16	Claudia M.	LAF5 / Lot 3	\$5,000.00	6/7/2010
17	Mark S. (Floatron, Inc)	LAF5 / Lot 3	\$100,000.00	6/9/2010
18	Mark S.	LAF5 / Lot 3	\$100,000.00	6/9/2010
19	Claudia M.	LAF5 / Lot 3	\$10,000.00	7/28/2010
20	Stephanie C.	LAF5 / Lot 3	\$75,000.00	8/11/2010
21	Claudia M.	LAF5 / Lot 3	\$10,000.00	8/13/2010
22	David A M.	LAF5 / Lot 3	\$251,500.00	8/27/2010
23	Claudia M.	LAF5 / Lot 3	\$10,000.00	9/22/2010
24	Victoria J M.	Lot 47	\$50,000.00	10/7/2010
25	Gloria P.	LAF5 / Lot 3	\$55,000.00	10/12/2010
26	Mark S.	C & D	\$100,000.00	10/27/2010
27	Mark S. (Fuel Fresh, Inc)	C & D	\$100,000.00	11/9/2010
28	Milton S K. Bypass Trt	C & D	\$75,000.00	11/9/2010
	S. K. Trust	C & D	\$100,000.00	11/9/2010
	Lisa D.	C & D	\$20,000.00	11/10/2010
	Mark S. (Floatron, Inc)	C & D	\$100,000.00	11/10/2010
	Claudia M.	LAF5 / Lot 3	\$10,000.00	11/12/2010
	Charles S.	C & D	\$40,000.00	11/15/2010
	Theresa A W.	C & D	\$40,000.00	11/29/2010
	Douglas & Janine D.	C & D	\$35,000.00	11/30/2010
	Georgia H.	C & D	\$40,000.00	11/30/2010
	May Beth/Jay H.	C & D	\$25,000.00	11/30/2010
	LIU of NA Local 113	C & D	\$25,000.00	12/3/2010
	Geraldine M.	C & D	\$30,000.00	12/3/2010

1	Thomas J & Holly M M.	LAF5 / Lot 3	\$15,000.00	12/10/2010
2	Cynthia M.	LAF5 / Lot 3	\$25,000.00	12/10/2010
3	Vicki N.	LAF5 / Lot 3	\$10,000.00	12/10/2010
4	Douglas & Janine D.	C & D	\$15,000.00	12/14/2010
5	Sally N.	C & D	\$146,391.33	12/21/2010
6	Lisa & Larry B.	LAF5 / Lot 3	\$15,000.00	12/30/2010
7	Robert G.	C & D	\$30,000.00	1/6/2011
8	Louros W.	LAF5 / Lot 3	\$19,000.00	1/6/2011
9	S. K. Trust	C & D	\$100,000.00	1/7/2011
10	Robert D W.	LAF5 / Lot 3	\$101,979.27	1/7/2011
11	Pearl H.	C & D	\$112,769.10	1/13/2011
12	Pearl H.	C & D	\$30,000.00	1/13/2011
13	Pearl H.	PPP	\$11,633.00	1/13/2011
14	Maclovio S.	PPP	\$15,000.00	1/13/2011
15	Jose Angel F.	PPP	\$26,700.00	1/20/2011
16	Esther M.	PPP	\$29,000.00	1/20/2011
17	Rita M.	PPP	\$23,500.00	1/20/2011
18	Juan R.	PPP	\$30,600.00	1/20/2011
19	Jorge V.	PPP	\$15,650.00	1/20/2011
20	Stephen P A.	PPP	\$25,000.00	1/24/2011
21	Corey M.	PPP	\$25,000.00	1/24/2011
22	Armando S.	PPP	\$25,000.00	1/24/2011
23	Stephen P A.	C & D	\$25,000.00	1/25/2011
24	Corey M.	C & D	\$25,000.00	1/25/2011
25	Claudia M.	LAF5 / Lot 3	\$10,000.00	1/25/2011
26	Julian R.	C & D	\$49,500.00	1/27/2011
27	Armando S.	C & D	\$25,000.00	1/27/2011
28	Robert D W.	LAF5 / Lot 3	\$87,500.00	1/28/2011
	Geraldine M.	PPP	\$27,000.00	2/1/2011
	Julian R.	PPP	\$49,500.00	2/1/2011
	Merlin R J.	LAF5 / Lot 3	\$50,000.00	2/4/2011
	Armando S.	LAF5 / Lot 3	\$18,200.00	2/4/2011
	Todd T.	PPP	\$10,000.00	2/11/2011
	Socorro B.	C & D	\$25,000.00	2/15/2011
	Socorro B.	PPP	\$10,000.00	2/17/2011
	Nicki R.	C & D	\$44,800.00	2/28/2011
	Ronald R & Diane L E.	LAF5 / Lot 3	\$10,000.00	3/7/2011
	Marilyn B.	LAF5 / Lot 3	\$11,000.00	3/11/2011
	Ian S & Janine L D.	LAF5 / Lot 3	\$20,000.00	3/11/2011
	Jessica Lauren P. (H)	LAF5 / Lot 3	\$10,000.00	3/16/2011
	Barbara D.	PPP	\$20,000.00	3/21/2011

1	Ralph F.	PPP	\$12,000.00	3/21/2011
	Ralph F.	PPP	\$8,000.00	3/21/2011
2	Ronald R & Diane L B.	C & D	\$114,000.00	3/25/2011
3	Ronald R & Diane L B.	LAF5 / Lot 3	\$42,000.00	3/25/2011
	Stephen P A.	LAF5 / Lot 3	\$20,700.00	4/4/2011
4	Todd T.	LAF5 / Lot 3	\$10,000.00	4/4/2011
5	Akinwale A.	LAF5 / Lot 3	\$10,000.00	4/8/2011
	Kevin W B.	LAF5 / Lot 3	\$11,100.00	4/19/2011
6	Amparo Carmen C.	C & D	\$25,000.00	4/19/2011
7	Amparo Carmen C.	LAF5 / Lot 3	\$24,530.00	4/25/2011
	Cheryl A M.	LAF5 / Lot 3	\$30,000.00	4/25/2011
8	Cheryl A M.	ERCN	\$25,000.00	4/25/2011
9	Rolando & Wendy R.	C & D	\$25,000.00	4/27/2011
	Dale & Leslie M.	LAF5 / Lot 3	\$11,800.00	5/5/2011
10	Brian J & Julie Z.	ERCN	\$10,000.00	5/5/2011
11	Ronald R & Diane L B.	PPP	\$25,000.00	5/6/2011
	Marc & Ruth D.	PPP	\$10,000.00	5/6/2011
12	Judy K P.	LAF5 / Lot 3	\$61,753.00	5/6/2011
13	Rolando & Wendy R.	PPP	\$10,000.00	5/6/2011
	Judy K P.	C & D	\$100,000.00	5/13/2011
14	Dennis M.	C & D	\$43,000.00	5/17/2011
15	Robert D W.	C & D	\$127,550.00	5/18/2011
	Marc & Ruth D.	PPP	\$10,000.00	5/23/2011
16	Geraldine C G.	PPP	\$15,000.00	5/23/2011
17	Judy K P.	PPP	\$61,753.00	5/23/2011
	John B.	LAF5 / Lot 3	\$10,000.00	5/26/2011
18	Amy M.	LAF5 / Lot 3	\$12,500.00	5/26/2011
19	Nicki R.	LAF5 / Lot 3	\$20,000.00	5/26/2011
	Maclovio S.	LAF5 / Lot 3	\$15,000.00	5/26/2011
20	Gerald B.	C & D	\$50,000.00	5/31/2011
21	Gerald B.	PPP	\$20,000.00	5/31/2011
	Gerald B.	LAF5 / Lot 3	\$20,000.00	5/31/2011
22	Raquel H.	LAF5 / Lot 3	\$16,500.00	5/31/2011
23	Dale & Leslie M.	PPP	\$43,000.00	5/31/2011
	Filemon V.	PPP	\$51,200.00	5/31/2011
24	Harry H.	ERCN	\$40,000.00	6/2/2011
25	Dale & Leslie M.	C & D	\$49,000.00	6/7/2011
	Sally S.	C & D	\$35,448.00	6/7/2011
26	Margaret T.	ERCN	\$25,000.00	6/7/2011
27	Harry H.	LAF5 / Lot 3	\$40,000.00	6/9/2011
28	Merlin R J.	ERCN	\$25,000.00	6/9/2011

1	Gian C L.	ERCN	\$10,000.00	6/9/2011
2	Michael E.	C & D	\$22,050.00	6/13/2011
3	Joseph R.	LAF5 / Lot 3	\$35,000.00	6/13/2011
4	Sally S.	ERCN	\$130,000.00	6/13/2011
5	Sally S.	C & D	\$63,000.00	6/13/2011
6	Harry H.	PPP	\$18,500.00	6/14/2011
7	Jeffery H.	C & D	\$33,000.00	6/21/2011
8	Jeffery H.	LAF5 / Lot 3	\$21,861.00	6/21/2011
9	LIU of NA Local 113	ERCN	\$100,000.00	6/21/2011
10	Akinwale A.	ERCN	\$10,000.00	6/28/2011
11	Jorge O.	PPP	\$5,250.00	7/8/2011
12	Richard & Deborah H.	LAF5 / Lot 3	\$15,000.00	7/15/2011
13	Brian J & Julie Z.	LAF5 / Lot 3	\$21,500.00	7/15/2011
14	Angela B.	ERCN	\$30,000.00	8/4/2011
15	Robert G. (Tuamotm, Inc)	ERCN	\$20,000.00	8/4/2011
16	Rolando & Wendy R.	LAF5 / Lot 3	\$10,200.00	8/4/2011
17	Rolando & Wendy R.	LAF5 / Lot 3	\$10,000.00	8/4/2011
18	Francisco J S.	PPP	\$15,650.00	8/4/2011
19	Margaret T.	LAF5 / Lot 3	\$5,000.00	8/4/2011
20	Angela B.	LAF5 / Lot 3	\$12,000.00	8/5/2011
21	Angela B.	PPP	\$10,000.00	8/12/2011
22	Douglas & Janine D.	ERCC	\$60,000.00	8/23/2011
23	Merlin R J.	ERCC	\$15,000.00	8/23/2011
24	Marjorie K. Revocable Trust	ERCC	\$50,000.00	8/23/2011
25	Mark S. (Floatron, Inc)	ERCC	\$300,000.00	8/23/2011
26	Mark S. (Fuel Fresh, Inc)	ERCC	\$100,000.00	8/23/2011
27	Geraldine M.	LAF5 / Lot 3	\$10,000.00	8/23/2011
28	Mark S.	ERCC	\$20,000.00	8/23/2011
	Heather W.	ERCN	\$20,047.69	8/31/2011
	Wolf K. (Germania Limited)	ERCN	\$25,000.00	9/1/2011
	Christopher H.	ERCC	\$20,000.00	9/16/2011
	Deborah Jean R.	LAF5 / Lot 3	\$7,000.00	9/19/2011
	Firmin B.	ERCN	\$30,000.00	9/21/2011
	Charles S.	ERCC	\$15,000.00	10/7/2011
	Margaret T.	ERCC	\$15,000.00	10/7/2011
	Donna J.	ERCC	\$14,800.00	10/11/2011
	Gerald L.	ERCC	\$18,500.00	10/12/2011
	Douglas & Janine D.	ERCC	\$90,000.00	10/25/2011
	Ian S & Janine L D.	ERCC	\$90,000.00	10/25/2011

1	Lawrence H.	LAF5 / Lot 3	\$50,000.00	10/28/2011
2	Debra G.	LAF5 / Lot 3	\$10,000.00	11/1/2011
3	Debra G.	PPP	\$5,000.00	11/1/2011
4	Ronald R & Diane L B.	LAF5 / Lot 3	\$40,000.00	11/2/2011
5	Debra G.	ERCC	\$33,000.00	11/4/2011
6	Julian R.	ERCC	\$30,000.00	11/15/2011
7	Marjorie K. Revocable Trust	ERCC	\$100,000.00	11/16/2011
8	Brenda G.	ERCC	\$30,000.00	11/17/2011
9	Mark S. (Floatron, Inc)	ERCC	\$100,000.00	11/17/2011
10	Carole A P.	ERCC	\$40,000.00	11/18/2011
11	John E S.	LAF5 / Lot 3	\$11,009.64	11/23/2011
12	Nicki R.	ERCC	\$30,000.00	11/29/2011
13	Robin S.	ERCC	\$84,000.00	11/29/2011
14	Gerald B.	ERCC	\$50,000.00	11/30/2011
15	David R & Janice M S.	ERCC	\$50,000.00	11/30/2011
16	Robin S.	LAF5 / Lot 3	\$96,000.00	12/5/2011
17	Juanita P.	LAF5 / Lot 3	\$8,400.00	12/8/2011
18	Juanita P.	LAF5 / Lot 3	\$3,000.00	12/8/2011
19	Julian R.	ERCC	\$30,300.00	12/8/2011
20	Robin S.	LAF5 / Lot 3	\$91,000.00	12/9/2011
21	Sally N.	ERCC	\$15,000.00	12/15/2011
22	Jerome L.	ERCC	\$15,000.00	12/21/2011
23	Jerome L.	LAF5 / Lot 3	\$10,000.00	12/21/2011
24	Mary Ann W.	ERCC	\$100,000.00	12/21/2011
25	Natalie S.	ERCN	\$88,000.00	1/4/2012
26	Natalie S.	ERCN	\$8,000.00	1/4/2012
27	Cheryl A M.	LAF5 / Lot 3	\$50,000.00	1/11/2012
28	Pearl H.	LAF5 / Lot 3	\$12,500.00	1/26/2012
	Jose Angel F.	ERCC	\$31,500.00	1/27/2012
	Esther M.	LAF5 / Lot 3	\$34,000.00	1/27/2012
	Rita M.	ERCC	\$23,500.00	1/27/2012
	Juan R.	ERCC	\$31,000.00	1/27/2012
	Armando S.	LAF5 / Lot 3	\$34,600.00	1/27/2012
	Maclovio S.	LAF5 / Lot 3	\$25,000.00	1/27/2012
	Corey M.	LAF5 / Lot 3	\$30,000.00	2/1/2012
	Jorge V.	ERCC	\$18,500.00	2/1/2012
	Stephen P A.	PPP	\$33,500.00	2/6/2012
	Karen M A.	ERCC	\$20,000.00	2/9/2012
	Grace Chapel Inc.	ERCC	\$10,000.00	2/9/2012
	Geraldine M.	LAF5 / Lot 3	\$30,000.00	2/16/2012

1	Julian R.	PPP	\$69,000.00	2/17/2012
2	Corey M.	PPP	\$29,500.00	2/22/2012
3	Pearl H.	LAF5 / Lot 3	\$15,000.00	2/24/2012
4	Douglas & Janine D.	ERC Chicago	\$35,000.00	2/28/2012
5	Mark S.	C & D	\$25,000.00	2/28/2012
6	Marilee W.	ERCC	\$52,500.00	3/1/2012
7	Equity Trust Company (Unidentified Investor)	Unknown	\$25,000.00	3/2/2012
8	Susan G.	LAF5 / Lot 3	\$20,973.00	3/2/2012
9	Todd & Pamela N.	LAF5 / Lot 3	\$12,790.00	3/2/2012
10	Todd & Pamela N.	LAF5 / Lot 3	\$8,117.00	3/2/2012
11	Todd & Pamela N.	LAF5 / Lot 3	\$4,700.00	3/2/2012
12	Karen M A.	LAF5 / Lot 3	\$10,000.00	3/6/2012
13	Maury & Teresa S.	LAF5 / Lot 3	\$15,000.00	3/6/2012
14	Mary Ann W.	LAF5 / Lot 3	\$50,000.00	3/6/2012
15	Karen M A.	PPP	\$18,000.00	3/9/2012
16	Catherine B. (P)	LAF5 / Lot 3	\$10,000.00	3/16/2012
17	Faye E.	ERCC	\$31,900.00	3/16/2012
18	Karen H. (JDI Services)	ERC Chicago	\$50,000.00	3/16/2012
19	Todd & Pamela N.	LAF5 / Lot 3	\$10,000.00	3/16/2012
20	Sally N.	LAF5 / Lot 3	\$20,000.00	3/22/2012
21	Nicki R.	ERC Chicago	\$25,000.00	3/22/2012
22	Unidentified Payee V.	ERC Chicago	\$39,000.00	3/22/2012
23	Ervin & Carleita C. (Cannon Holdings)	ERC Chicago	\$30,000.00	3/23/2012
24	Lawrence H.	ERC Chicago	\$50,000.00	3/23/2012
25	B. Living Trust	ERCN	\$50,000.00	3/25/2012
26	Kathleen K.	LAF5 / Lot 3	\$10,000.00	3/28/2012
27	Kathleen K. C. Trust	LAF5 / Lot 3	\$10,000.00	3/28/2012
28	Susan G.	ERC Chicago	\$34,221.00	3/30/2012
	Marjorie K. (MGK Inc.)	Other: Polanchek	\$20,000.00	4/9/2012
	Nicki R.	LAF5 / Lot 3	\$10,000.00	4/9/2012
	Socorro B.	PPP	\$28,000.00	4/13/2012
	Deanna S.	LAF5 / Lot 3	\$10,000.00	4/17/2012
	Margaret T.	LAF5 / Lot 3	\$8,400.00	4/17/2012
	Mary Ann W.	LAF5 / Lot 3	\$50,000.00	4/24/2012
	Matthew S.	ERC Chicago	\$270,000.00	4/27/2012
	Susan G.	LAF5 / Lot 3	\$20,000.00	5/3/2012
	Laura L.	LAF5 / Lot 3	\$5,000.00	5/3/2012
	Marilee W.	LAF5 / Lot 3	\$17,663.00	5/3/2012
	Richard J & Diane F B.	LAF5 / Lot 3	\$41,000.00	5/7/2012

1	Judy P. Revocable Trust	LAF5 / Lot 3	\$60,000.00	5/7/2012
2	Richard J & Diane F B.	PPP	\$12,000.00	5/9/2012
3	Wade C.	LAF5 / Lot 3	\$10,000.00	5/9/2012
4	Dale & Leslie M.	LAF5 / Lot 3	\$40,000.00	5/9/2012
5	George M.	LAF5 / Lot 3	\$100,000.00	5/9/2012
6	Judy K P.	LAF5 / Lot 3	\$10,000.00	5/9/2012
7	Mark S. (Floatron, Inc)	Other: Polanchek	\$50,000.00	5/10/2012
8	Julian R.	LAF5 / Lot 3	\$20,000.00	5/10/2012
9	Ronald R & Diane L B.	LAF5 / Lot 3	\$120,000.00	5/11/2012
10	Kathleen K.	LAF5 / Lot 3	\$42,000.00	5/11/2012
11	Corey M.	LAF5 / Lot 3	\$57,700.00	5/14/2012
12	Ralph F.	LAF5 / Lot 3	\$10,000.00	5/18/2012
13	Adrianna N.	LAF5 / Lot 3	\$18,800.00	5/18/2012
14	Todd T.	LAF5 / Lot 3	\$12,000.00	5/18/2012
15	Todd T.	PPP	\$10,000.00	5/18/2012
16	Brian J & Julie Z.	LAF5 / Lot 3	\$10,000.00	5/18/2012
17	Richard J & Diane F B.	PPP	\$18,000.00	5/25/2012
18	Dale & Leslie M.	ERC Chicago	\$100,000.00	5/25/2012
19	Alfredo M.	LAF5 / Lot 3	\$10,000.00	5/25/2012
20	Richard J & Diane F B.	LAF5 / Lot 3	\$43,000.00	5/29/2012
21	Debra G.	LAF5 / Lot 3	\$9,000.00	5/29/2012
22	Adrianna N.	ERC Chicago	\$25,000.00	5/29/2012
23	Natalie S.	ERC Chicago	\$6,800.00	5/29/2012
24	Natalie S.	ERC Chicago	\$1,200.00	5/29/2012
25	Marc & Ruth D.	PPP	\$50,000.00	5/30/2012
26	Marc & Ruth D.	ERC Chicago	\$50,000.00	5/30/2012
27	Marc & Ruth D.	PPP	\$10,000.00	5/30/2012
28	Ralph F.	LAF5 / Lot 3	\$10,000.00	5/31/2012
	Karen H. (JDI Services)	ERC Chicago	\$41,000.00	6/1/2012
	Kathleen K.	ERC Chicago	\$100,000.00	6/1/2012
	Paulette P.	ERC Chicago	\$40,000.00	6/1/2012
	Paulette P.	LAF5 / Lot 3	\$20,000.00	6/1/2012
	Donna J.	ERC Chicago	\$9,200.00	6/5/2012
	G.	ERC Chicago	\$20,000.00	6/7/2012
	Judith W.	PPP	\$15,000.00	6/7/2012
	George M.	ERC Chicago	\$40,000.00	6/13/2012
	Ismael T.	LAF5 / Lot 3	\$24,800.00	6/18/2012
	Mark S. (Floatron, Inc)	Other: Polanchek	\$25,000.00	6/29/2012
	Sally S.	ERC Chicago	\$20,000.00	7/5/2012
	Mark S. (Floatron, Inc)	Other: Polanchek	\$25,000.00	7/10/2012
	Mark S. (Fuel Fresh, Inc)	Other: Polanchek	\$25,000.00	7/10/2012

1	Mark S. (Fuel Fresh, Inc)	Other: Polanchek	\$22,500.00	7/20/2012
2	Dennis M.	PPP	\$16,000.00	7/23/2012
3	Unidentified Payee V.	ERC Chicago	\$89,227.00	7/26/2012
4	Virginia R C.	ERC Chicago	\$25,000.00	8/1/2012
5	Donielle F.	ERC Chicago	\$15,000.00	8/1/2012
6	Jay Carl Warren & Teresa T.	ERC Chicago	\$100,000.00	8/3/2012
7	Gerald B.	PPP	\$50,000.00	8/10/2012
8	Harry H.	PPP	\$22,200.00	8/10/2012
9	Naomi Lynn P. (Nkitten LLC)	ERC Chicago	\$15,500.00	8/10/2012
10	Gian C L.	LAF5 / Lot 3	\$16,000.00	8/13/2012
11	Charles S.	ERC Chicago	\$50,000.00	8/23/2012
12	Firmin B.	ERC Chicago	\$30,000.00	8/24/2012
13	Lawrence H.	Mar De Cortez	\$50,000.00	8/27/2012
14	Margaret T.	Mar De Cortez	\$10,000.00	8/29/2012
15	Unidentified Payee V.	ERC Chicago	\$8,000.00	8/31/2012
16	Judith A A.	Mar De Cortez	\$10,000.00	9/5/2012
17	Kevin H.	ERC Chicago	\$50,000.00	9/6/2012
18	Virginia R C.	Mar De Cortez	\$16,850.00	9/10/2012
19	Rose J.	Mar De Cortez	\$50,000.00	9/17/2012
20	Lawrence Kelly C.	Mar De Cortez	\$17,028.00	9/20/2012
21	Mark S. (Floatron, Inc)	Other: Christy Paige	\$100,000.00	9/20/2012
22	Jorge O.	Mar De Cortez	\$7,700.00	9/20/2012
23	Judy K P.	ERC Chicago	\$50,000.00	9/25/2012
24	Jessica & Paul W.	Mar De Cortez	\$30,000.00	9/26/2012
25	Virginia R C.	Mar De Cortez	\$15,600.00	10/9/2012
26	Douglas & Janine D.	ERC Chicago	\$50,000.00	10/9/2012
27	Adam O.	ERC Chicago	\$216,413.49	10/15/2012
28	Francisco J S.	Mar De Cortez	\$18,000.00	10/17/2012
	Paula O.	ERC Chicago	\$600,000.00	10/18/2012
	Douglas & Janine D.	ERC Chicago	\$50,000.00	10/30/2012
	Anthony G.	Mar De Cortez	\$20,000.00	10/30/2012
	Dale & Leslie M.	PPP	\$40,000.00	10/30/2012
	Equity Trust Company (Unidentified Investor)	Mar De Cortez	\$27,600.00	11/6/2012
	Unidentified Investor	Mar De Cortez	\$10,000.00	11/13/2012
	Mark S. (Floatron, Inc)	Other: Christy Paige	\$50,000.00	11/16/2012
	Aranda R.	PPP	\$30,000.00	11/19/2012
	Paul M. (Simako LLC)	ERC Chicago	\$100,000.00	12/5/2012
	Clinton F.	ERC Chicago	\$100,000.00	2/1/2013

Mark S. (Fuel Fresh, Inc)	ERC Chicago	\$30,000.00	4/23/2013
Ralph F.	ERC Chicago	\$25,000.00	5/9/2013
Total Amount Raised		\$18,177,199	

COUNT 1
Conspiracy
(18 U.S.C. § 371)

The factual allegations in paragraphs 1 through 11 are incorporated by reference and re-alleged as though fully set forth herein.

12. Beginning at a time unknown to the grand jury, but at least as early as on or about January 1, 2006, and continuing to a time unknown to the grand jury, but to at least on or about June of 2014, in the District of Arizona and elsewhere, Defendants JASON MOGLER, JAMES HINKELDEY, CASIMER POLANCHEK, JAMES STEVENS, and SYLVIA TORRES, individually and doing business under the entities described above, along with other individuals and entities known and unknown to the Grand Jury, knowingly and willfully agreed and conspired with each other and others to commit the following offenses against the United States: mail fraud, in violation of 18 U.S.C. § 1341; wire fraud, in violation of 18 U.S.C. § 1343; aggravated identity theft, in violation of 18 U.S.C. § 1028A, and transactional money laundering, in violation of 18 U.S.C. § 1957.

Manner and Means of the Conspiracy

13. The manner and means used by Defendants and others, individually and through the entities described above, to effect the objects of the conspiracy and scheme to defraud, included the following:

a. As set forth more fully in paragraph 7 above, Defendants made materially false representations and omissions in solicitations relating to the purchase and/or development of land located in Sonora, Mexico, collecting approximately \$8.2 million from investor-victims, and using that money for other purposes, primarily for personal expenditures, other fraudulent or failed business ventures, and payments to earlier investor-victims.

b. As set forth more fully in paragraph 8 above, Defendants made

1 materially false representations and omissions in solicitations relating to the creation of
2 and equipment for recycling centers in Las Vegas and Chicago, collecting approximately
3 \$7 million from investor-victims, and then using that money for other purposes, primarily
4 for personal expenditures, other business ventures, and payments to earlier investor-
5 victims.

6 c. As set forth more fully in paragraph 9 above, Defendants made false
7 representations and omissions in solicitations to investors relating to the purchase and re-
8 sale of distressed residential real estate located in Phoenix, collecting approximately \$1.1
9 million from investor-victims, and then using that money for other purposes, primarily
10 for personal expenditures, other business ventures, and payments to earlier investor-
11 victims.

12 d. For each type of fraudulent investment, Defendants regularly co-
13 mingled funds, failed to keep accurate books and records, disregarded tax laws, lulled
14 investors with contract extensions, interim Ponzi-type payments, and other deceptions,
15 and produced fabricated documents. Virtually every component of the conspiracy and
16 scheme was fraudulent.

17 **Overt Acts of the Conspiracy**

18 14. In furtherance of the conspiracy, and to effect the objects of the conspiracy,
19 Defendants, individually and doing business under the entities described above, along
20 with other individuals and entities known and unknown to the Grand Jury, committed or
21 caused to be committed, various overt acts in the District of Arizona and elsewhere,
22 including but not limited to the following:

23 a. As set forth in more detail in paragraph 10, Defendants issued 18
24 PPMs to investor-victims on or about the dates indicated.

25 b. As set forth in more detail in paragraph 11, Defendants obtained 442
26 investments from 226 investors, totaling \$18,177,199, on or about the dates listed.

27 c. On a radio show called "The Investment Roadshow," aired on or
28

1 about October 18, 2010, MOGLER and HINKELDEY purported to discuss their own
2 investments in the land development in Mexico and recycling projects, and falsely touted
3 the "safety" of the investments; MOGLER stated, "And by "safe," I mean it's secured by
4 either land or its land-backed security."

5 d. In an interview for "Personal Real Estate Investor Magazine,"
6 printed in the January/February 2011 issue, MOGLER addressed the Phoenix distressed
7 real estate investment opportunity, falsely stating that investor funds were kept in an
8 escrow account, that the principals only made money after the investors were paid, and
9 that the historical return rate was more than 30%.

10 e. In 2009, MOGLER purchased his place of residence, located at ****
11 North 15th Street, Phoenix, AZ, directly from investor funds, as follows:

12 i) on or about October 7, 2009, investor-victim Mark S. issued an
13 investment check of \$100,000 to TCC, which was deposited into Wells Fargo Bank
14 account ending 5279 in the name of TCC;

15 ii) on or about October 20, 2009, investor Ruth N. issued an
16 investment check for \$102,500 to TCC 2, which was also deposited into Wells Fargo
17 Bank account ending 5279;

18 iii) on or about November 30, 2009, MOGLER wired \$138,081.37
19 from Wells Fargo Bank account ending 5279 to Thomas Title as closing funds for the
20 purchase of the residence, held in the name of TCC, owned by MOGLER and
21 HINKELDEY;

22 iv) on or about June 22, 2012, MOGLER deeded the property to
23 PPP, an entity owned by MOGLER and HINKELDEY; and

24 v) on or about June 25, 2012, Mogler obtained a \$130,000 loan
25 using the residence as collateral, subsequently using the money for personal expenses.

26 f. HINKELDEY provided at least the following 15 false and
27 misleading periodic podcasts to investors with updates on the status of the development
28

1 of Lot 47 in Mexico, on or about: November of 2009, December of 2009, January of
2 2010, February of 2010, March of 2010, April of 2010, May of 2010, June of 2010,
3 December of 2010, January of 2011, February of 2011, May of 2011, July of 2011,
4 August of 2011, and October of 2011.

5 g. On or about September 16, 2009, POLANCHEK corresponded with
6 investor Rob N. regarding real estate development in Mexico, falsely stating that "Tri-
7 Core offers investors . . . land and the first [lien]holder position to secure investors
8 money," that "Tri-Core . . . own[s] all their property in full," and that "I personally invest
9 with Tri-Core as a great, over and over performing part of my portfolio. I have made
10 great returns and have got paid out on every investment that I have personally made over
11 the years."

12 h. On or about February 28, 2011, POLANCHEK participated as a
13 presenter on the radio show "The Investment Roadshow" and falsely stated in reference
14 to investments with AIC, "And the alternative investments have done great for me
15 personally, and you know I – I personally have never lost any money in alternative
16 investments, because I'm always in the first secured position." He also falsely stated in
17 reference to ERC, "They have land, they have assets."

18 i. In December of 2009, June of 2010, and March of 2011, STEVENS
19 provided false and misleading podcasts to investors with updates on the status of the
20 development of Lot 5 in Mexico.

21 j. On April 6, 2014, STEVENS met with a large group of investors in
22 the Lot 5 real estate development in Mexico and falsely stated to investors, among other
23 things, that: \$750,000 of investor funds had been spent on legal fees and engineering,
24 that he and MOGLER had been personally funding the project for 5 years, and that the lot
25 currently appraised at \$10 million.

26 k. On or about the dates below, STEVENS provided fraudulent
27 appraisals for the development projects in Mexico:
28

Date	Parcel	Appraised Value	Price Per Acre
5/26/07	Lot 47	\$2,900,000	\$116,000
10/10/07	Lot 5	\$63,600,000	\$254,400
10/20/07	Lot 46	\$11,900,000	\$136,782
5/18/08	Parcel 5 of Lot 5	\$13,400,000	\$209,375
2/12/09	Lot 3	\$3,800,000	\$223,529
1/15/2010	Lot 3	\$4,000,000	\$235,294
9/15/11	Lot 47	\$3,700,000	\$148,000
5/25/12	Lot 46 & 47	\$10,900,000	\$94,782

1. On or about July 14, 2012, TORRES participated in the creation and dissemination of the PPM for the Mar de Cortez purported development project, listing herself as Director of Marketing of the project and listing family members and friends in various positions.

m. In late 2013, TORRES backdated a contract in which she purported to sell lot 3 to TCC to April of 2010, to falsely reflect that a sale occurred prior to the issuance of the PPMs related to lot 3.

n. In late 2012 and early 2013, TORRES directed acquaintance Oscar Hernandez to purport to be the owner of Mar de Cortez, LLC (August 3, 2012) and the Mar de Cortez bank account (August 7, 2012 – February 19, 2013). TORRES further directed him to act as the maker on Mar de Cortez promissory notes (August – November, 2012) and as the Project Manager of the Mar de Cortez development project (July 14, 2012).

This conduct was in violation of 18 U.S.C. § 371.

COUNTS 2 – 18
Mail Fraud
(18 U.S.C. § 1341)

The factual allegations in paragraphs 1 through 14 are incorporated by reference and re-alleged as though fully set forth herein.

15. Beginning at a time unknown to the grand jury, but at least as early as on or about January 1, 2006, and continuing to a time unknown to the grand jury, but to at least on or about June of 2014, in the District of Arizona and elsewhere, Defendants JASON

MOGLER, JAMES HINKELDEY, CASIMER POLANCHEK, JAMES STEVENS, and SYLVIA TORRES, individually and doing business under the entities described above, along with other individuals and entities known and unknown to the Grand Jury, knowingly and willfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property from investor-victims by means of materially false and fraudulent pretenses and representations, and by the concealment and omission of material facts.

16. For the purpose of executing and attempting to execute the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises and the concealment and omission of material facts, Defendants, individually and doing business as the entities described above, did place and cause mail matter to be placed in a post office and authorized depository for mail matter, to be sent and delivered by the United States Postal Service or other commercial interstate carriers, with each instance being a separate count of the indictment:

Count	Material Mailed	Mailing Date (on or about)	Sender	Recipient
2	LAF 5 investment document	10/12/2010	TCC	Gloria P.
3	Newsletter promoting AIC investments	11/1/2010	Fidelity, on behalf of AIC	Douglas D.
4	LAF5 investment documents	12/30/2010	TCC	Lisa B.
5	C&D investment documents	12/28/2011	C&D	Nicki R.
6	Newsletter promoting AIC investments	3/17/2011	Entrust, on behalf of AIC	Barbara D.
7	Mexican land (Lot 5) investment documents	4/30/2011	TCBD	Harry W.
8	ERC of Nevada investment documents	6/16/2011	ERC	Akinwale A.
9	ERC of Nevada investment documents	9/1/2011	ERC	Wolf K.

10	ERC Compactors investment documents	9/16/2011	ERC	Christopher H.
11	ERC of Nevada investment documents	9/21/2011	ERC	Firmin B.
12	ERC Compactors invest. documents and check	10/12/2011	Gerald L.	ERC Compactors
13	ERC of Chicago investment documents	4/27/2012	ERC	Matt S.
14	Advertising flyer for investment seminar	6/1/2012	AII	Alfredo M.
15	ERC of Chicago investment documents	8/1/2012	ERC	Danielle F.
16	ERC of Chicago investment documents	8/24/2012	ERC	Firmin B.
17	Mar de Cortez investment documents	8/27/2012	TCC	Lawrence H.
18	PPP investment documents	5/28/2013	AIC	Todd T.

This conduct was in violation of 18 U.S.C. § 1341.

Counts 19 – 57
Wire Fraud
(18 U.S.C. § 1343)

The factual allegations in paragraphs 1 through 16 are incorporated by reference and re-alleged as though fully set forth herein.

17. Beginning at a time unknown to the grand jury, but at least as early as on or about January 1, 2006, and continuing to a time unknown to the grand jury, but to at least on or about June of 2014, in the District of Arizona and elsewhere, Defendants JASON MOGLER, JAMES HINKELDEY, CASIMER POLANCHEK, JAMES STEVENS, and SYLVIA TORRES, individually and doing business under the entities described above, along with other individuals and entities known and unknown to the Grand Jury, knowingly and willfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property from investor-victims by means of materially false and fraudulent pretenses and representations, and by the concealment and omission of material facts.

18. On or about the dates listed below, for the purpose of executing and

attempting to execute the scheme or artifice to defraud and to obtain money and property, Defendants, individually and doing business under the entities described above, knowingly transmitted and caused to be transmitted, by means of wire and radio communications in interstate commerce, certain writings, pictures, signals and sounds, to and from the District of Arizona and elsewhere, as set forth below, with each instance being a separate count of this indictment:

Count	Wire Date (On or About)	Sender	Recipient	Item Sent
19	11/09/2010	Sherman M K. Rev Liv Trust; Fed Wire	TCBD, Gilbert, AZ Wells Fargo Bank	\$100,000
20	11/09/2010	Milton S K. Bypass Trt.; Fed Wire	TCBD, Gilbert, AZ Wells Fargo Bank	\$75,000
21	11/30/2010	Douglas & Janine D. Trust; Fed Wire	TCBD, Gilbert, AZ Wells Fargo Bank	\$35,000
22	12/14/2010	Douglas & Janine D. Trust; Fed Wire	TCBD, Gilbert, AZ Wells Fargo Bank	\$15,000
23	01/07/2011	Sherman M K. Rev Liv Trust; Fed Wire	TCBD, Gilbert, AZ Wells Fargo Bank	\$100,000
24	03/16/2011	Jessica P. (H.); Fed Wire	TCBD, Scottsdale, AZ Wells Fargo Bank	\$10,000
25	05/18/2011	Equity Trust (Robert W.); Fed Wire	TCBD, Gilbert, AZ Wells Fargo Bank	\$127,550
26	09/01/2011	Germania Limited (Wolf K.); Fed Wire	Operating Account (ERCN) Scottsdale, AZ Wells Fargo Bank	\$25,000
27	10/25/2011	Ian S D.; Fed Wire	ERCC, Scottsdale, AZ Wells Fargo Bank	\$90,000
28	10/25/2011	Douglas & Janine D. Trust; Fed Wire	ERCC, Scottsdale, AZ Wells Fargo Bank	\$90,000
29	02/28/2012	Douglas & Janine D. Trust; Fed Wire	ERC of Chicago Scottsdale, AZ Wells Fargo Bank	\$35,000
30	04/27/2012	Matthew V S.; Fed Wire	ERC of Chicago Scottsdale, AZ Wells Fargo Bank	\$270,000
31	08/03/2012	Jay Carl W. T.; Fed Wire	ERC of Chicago Scottsdale, AZ Wells Fargo Bank	\$100,000

32	09/27/2012	Mar De Cortez; Fed Wire	All UW Credit Union	\$14,165
33	10/18/2012	Paula O.; Fed Wire	ERC of Chicago Scottsdale, AZ Wells Fargo Bank	\$600,000
34	10/18/2010	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
35	11/24/2010	<u>Hink3@cox.net</u>	Paul S.	Extension of prom. note
36	12/23/2010	<u>jimstevensupdate@gmail.com</u>	<u>harryc****@yahoo.com</u> (victim)	12/10 podcast update
37	12/27/2010	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
38	1/25/2011	<u>jimstevensupdate@gmail.com</u>	<u>harryc****@yahoo.com</u> (victim)	1/11 podcast update
39	2/14/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
40	2/28/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
41	3/7/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
42	3/21/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
43	6/14/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
44	6/21/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
45	6/27/2011	<u>jimstevensupdate@gmail.com</u>	<u>harryc****@yahoo.com</u> (victim)	6/11 podcast update
46	6/28/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
47	7/26/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
48	8/2/2011	1510AM KFNN Radio, AZ	Radio Listeners (nat'l. and int'l.)	Investment Road Show
49	6/1/2012	<u>jimstevensupdate@gmail.com</u>	<u>harryc****@yahoo.com</u> (victim)	5/12 podcast update
50	9/13/2012	<u>jlexstevens@gmail.com</u>	<u>gian@tricoreworld.com</u> (Gian Lacayo)	Providing Mar de Cortez PPM to sales team
51	2/28/2013	<u>jim@azicenter.com</u>	<u>Mathias.p*****@gmail.com</u>	Status of Lot 47

52	3/7/2013	<u>jim@azicenter.com</u>	<u>Ma*****77@gmail.com</u>	Investor payments update
53	4/19/2013	<u>jimstevensupdate@gmail.com</u>	<u>dibol1@***global.net</u> (victim)	Podcast audio update
54	5/30/2013	<u>mexicoupdate@gmail.com</u>	<u>bdra***@gmail.com</u> (victim)	LAF5 update
55	9/2/2014	<u>jimjasonmexico@gmail.com</u>	<u>angie*****04@yahoo.com</u> (victim)	Lot 47 update
56	8/16/2014	<u>jimjasonmexico@gmail.com</u>	<u>angie*****04@yahoo.com</u> (victim)	Lot 47 update
57	8/9/2014	<u>jimjasonmexico@gmail.com</u>	<u>angie*****04@yahoo.com</u> (victim)	Lot 47 update

This conduct was in violation of 18 U.S.C. § 1343.

COUNTS 58 – 64
Aggravated Identity Theft
(18 U.S.C. § 1028A)

The factual allegations in paragraphs 1 through 18 are incorporated by reference and re-alleged as though fully set forth herein.

19. On or about the dates listed below, in the District of Arizona and elsewhere, Defendants JASON MOGLER, JAMES HINKELDEY, CASIMER POLANCHEK, JAMES STEVENS, and SYLVIA TORRES, individually and doing business under the entities described above, along with other individuals and entities known and unknown to the Grand Jury, during and in relation to the felony violations set forth in counts 2 through 57 above, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, with each instance being a separate count of this indictment:

Count	Date (on or about)	Victim	Activity
58	8/11/12	Donald S.	Forged signature of Donald S. as the "maker" on promissory note on behalf of Mar de Cortez; victim Virginia C.
59	8/6/12	Donald S.	Forged signature of Donald S. as the "maker" promissory note on behalf of Mar de Cortez; victim Larry C.

60	8/26/12	Donald S.	Forged signature of Donald S. as the "maker" on promissory note on behalf of Mar de Cortez; victim Jorge O.
61	7/14/12	Donald S.	Use of Donald S.'s name, biographical information, and company website in Mar de Cortez investment documents
62	7/14/12	Dallas T.	Use of Dallas T.'s name and biographical information in Mar de Cortez investment documents
63	7/14/12	Amit P.	Use of Amit P.'s name and biographical information in Mar de Cortez investment documents
64	9/15/11	Donald S.	Use of Donald S.'s name in appraisal certification for Lot 47

This conduct was in violation of 18 U.S.C. § 1028A.

COUNTS 65 – 84
Transactional Money Laundering
(18 U.S.C. § 1957)

The factual allegations in paragraphs 1 through 19 are incorporated by reference and re-alleged as though fully set forth herein.

20. On the dates listed below, Defendants JASON MOGLER, JAMES HINKELDEY, CASIMER POLANCHEK, JAMES STEVENS, and SYLVIA TORRES, individually and doing business under the entities described above, along with other individuals and entities known and unknown to the Grand Jury, knowingly engaged and attempted to engage in the following monetary transactions in the United States in criminally derived property of a value exceeding \$10,000, derived from specified unlawful activity, namely the violation of 18 U.S.C. § 1341 (mail fraud) as alleged in counts 2 through 18 above and 18 U.S.C. § 1343 (wire fraud) as alleged in counts 19 through 57 above, with each instance being a separate count under this indictment:

Count	Date (on or about)	Transaction Amount	Financial Institution	Transaction
65	12/1/2010	\$46,312.50	Wells Fargo Bank	Check from TCC to Polanchek LLC's Wells Fargo Bank account

66	6/15/2011	\$40,000	Wells Fargo Bank	Check from TCC HINKELDEY with memo of "1/2 August Bonus," deposited into Wells Fargo Bank account ending 3463 owned by HINKELDEY and wife
67	8/25/2011	\$50,000	Wells Fargo Bank	Cashier's check to HINKELDEY with memo of "Loan Land Secure," deposited into Wells Fargo Bank account ending 3463 owned by HINKELDEY and wife
68	9/14/2011	\$33,000	Wells Fargo Bank	Transfer from ERCC to Pangaea's Wells Fargo Bank account
69	11/3/2011	\$98,000	Wells Fargo Bank	Transfer of funds from Pangaea to Remisac for purchase of Lots 62, 63, and 64 of Stellar Industrial Park
70	11/4/2011	\$98,584.46	Wells Fargo Bank	Cashier's check from Remisac to Chicago Title Insurance Company for purchase of Lots 62, 63, and 64 of Stellar Industrial Park
71	1/3/2012	\$160,000	Wells Fargo Bank	Transfer from ERCC to TCC's Wells Fargo Bank account
72	1/3/2012	\$50,000	Wells Fargo Bank	Check from TCC to HINKELDEY with memo "50,000/100,000 Loan," deposited into Wells Fargo Bank account ending 3463 owned by HINKELDEY and wife
73	1/6/2012	\$497,981.66	Wells Fargo Bank	Funds received by Remisac from Security Title Agency PPP Account for sale of Lots 62, 63, and 64 of Stellar Industrial Park
74	1/18/2012	\$20,000	Wells Fargo Bank	Cashier's check from Remisac LLC to Towbin Motor Cars with memo "Casimer Polanchek"
75	1/19/2012	\$100,000	Wells Fargo Bank	Funds transferred from Polanchek LLC to Pangaea related to sale of Lots 62, 63, and 64 of Stellar Industrial Park
76	1/19/2012	\$100,000	Wells Fargo Bank	Funds transferred from Pangaea to PPP related to sale of Lots 62, 63, and 64 of Stellar Industrial Park
77	1/25/2012	\$368,000	Wells Fargo Bank	Cashier's check from Remisac to Pangaea related to sale of Lots 62, 63, and 64 of Stellar Industrial Park

78	2/1/2012	\$100,000	Wells Fargo Bank	Funds transferred from Pangaea to PPP related to sale of Lots 62, 63, and 64 of Stellar Industrial Park
79	2/1/2012	\$106,000	Wells Fargo Bank	Transfer from ERCC to PPP's Wells Fargo Bank account
80	2/2/2012	\$64,990	Wells Fargo Bank	Cashier's check from Pangaea to Lund Cadillac with memo "Jason Mogler"
81	5/30/2012	\$150,000	Wells Fargo Bank	Transfer from TCBD to PPP's Wells Fargo Bank account
82	6/5/2012	\$200,000	Wells Fargo Bank	Cashier's check from TCC STEVENS with memo "Lot 46," deposited in Remisac's Wells Fargo Bank account
83	7/23/2012	\$140,000	Wells Fargo Bank	Transfer of funds from Remisac to Pangaea relating to \$200,000 cashier's check
84	12/11/2012	\$300,000	Wells Fargo Bank	Transfer from ERC Chicago to TCBD's Wells Fargo Bank account

This conduct was in violation of 18 U.S.C. § 1957.

FORFEITURE ALLEGATIONS

The factual allegations in Paragraphs 1 through 20 are incorporated by reference and re-alleged as though fully set forth herein.

21. Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and 28 U.S.C. § 2461(c), upon conviction of one or more of the offenses alleged in counts 1 through 84 above, Defendants shall forfeit to the United States all right, title, and interest in any and all property, real or personal, involved in such offenses, or in any property traceable to such property involved in such offenses, including the following: (a) all money or other property that was the subject of each transaction or transfer in violation of a statute listed in 18 U.S.C. § 982, (b) all other property constituting proceeds obtained as a result of those violations, and (c) all property used in any manner or part to commit or to facilitate the commission of those violations, including but not limited to the sum of money representing the amount of money involved in the offenses. This includes the following property:

1 a. The following lots or parcels of land, together with any buildings,
2 appurtenances, improvements, fixtures, attachments and easements, described as:

3 • Lot 3, located in Colonia Melchor Ocampo, Golfo de Santa Clara, within
4 the jurisdiction of San Luis Rio Colorado, Sonora, Mexico, with a total surface of
5 14-00-00 hectares; and

6 • Lot 47, located in Ejido Vicente Guerrero, within the jurisdiction of San
7 Luis Rio Colorado, Sonora, Mexico, with a total surface of 10-86-98.61 hectares.

8 b. A sum of money equal to at least \$18,185,199 in U.S. currency,
9 representing the amount of money involved in the offenses. Defendants shall be jointly
10 and severally liable for this amount.

11 22. If any of the above-described forfeitable property, as a result of any act or
12 omission by any Defendant, cannot be located upon the exercise of due diligence, has
13 been transferred, sold to, or deposited with a third party, has been placed beyond the
14 jurisdiction of the court, had been substantially diminished in value, or has been
15 commingled with other property and cannot be divided without difficulty, it is the intent
16 of the United States to seek forfeiture of any other property of that Defendant up to the
17 value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p), as
18 incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461.

19 A TRUE BILL

20
21 /S/
22 FOREPERSON OF THE GRAND JURY
 Date: September 8, 2015

23 JOHN S. LEONARDO
24 United States Attorney
25 District of Arizona

26 /S/
27 MONICA B. KLAPPER
28 PETER SEXTON
 Assistant U.S. Attorneys